

DOWNEY BRAND LLP  
JAMIE P. DREHER (Bar No. 209380)  
Email: jdreher@downeybrand.com  
621 Capitol Mall, 18<sup>th</sup> Floor  
Sacramento, California 95814  
Telephone: 916.444.1000  
Facsimile: 916.444.2100

DEMAS LAW GROUP, P.C.  
JOHN DEMAS (Bar No. 161563)  
Email: jnd@demaslawgroup.com  
701 Howe Avenue, Suite A-1  
Sacramento, CA 95825  
Telephone: 916.764.3889  
Facsimile: 916.444.8250

Attorneys for Keri B. Howard and Rodney Lee Baggett

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

In re  
PG&E Corporation,  
and  
PACIFIC GAS AND ELECTRIC  
COMPANY,  
Debtors.

Case No. 19-30088-DM

Chapter 11  
Lead Case, Jointly Administered

**DECLARATION OF CORY CULVER IN  
SUPPORT OF MOTION PURSUANT TO  
FED. R. BANKR. P. 9006(b)(1) TO  
ENLARGE THE TIME FOR  
HOWARD/BAGGETT TO FILE PROOFS  
OF CLAIM**

☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors  
  
\*All papers shall be filed in the Lead Case,  
No. 19-30088-DM,

Date: April 7, 2020  
Time: 10:00 a.m.  
Crtrm.: Courtroom 17  
450 Golden Gate Avenue  
San Francisco, CA 94102  
Judge: Hon. Dennis Montali  
  
Objection deadline: March 31, 2020  
4:00 p.m. (Pacific Time)

I, Cory Culver, declare as follows:

1. I have personal knowledge of the facts stated in this declaration and, if sworn as a witness, could and would competently testify thereto.

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2. I am a law student at Santa Clara University School of Law.

3. I am a former employee at the Demas Law Group, P.C. and my dates of employment were February 18, 2019 to January 3, 2020.

4. While employed at Demas Law Group, P.C. I assisted attorneys and paralegals with various tasks for personal injury cases and assisted attorneys on cases for wildfire victims who sustained losses from the North Bay Fires in 2017 and the Camp Fire in 2018.

5. I was aware of the firm's standard operating practice regarding new or potential wildfire clients and the importance of inputting clients into the firm's case management system.

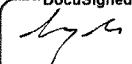
6. On Tuesday March 3, 2020 I was notified by Demas Law Group, P.C. that an email had been discovered in my firm email inbox from Keri Howard that was sent on September 30, 2019 with a completed questionnaire and a fee agreement attached. Attached hereto as **Exhibit A** is a copy of the September 25, 2019 email. I also learned that I mistakenly failed to forward that information on to anyone else at Demas Law Group, P.C. or follow standard operating practice and input the documents from Ms. Howard into the firm's case management system.

7. It is my understanding that, as a result, no one else at the firm knew of Kari Howard's documents and claim forms for Keri Howard and Rod Lee Baggett were not timely filed.

8. I moved to San Diego and my last day with the firm was January 3, 2020.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this <sup>3/13/2020</sup> \_\_\_\_\_ day of March, 2020, in <sup>San Diego</sup> \_\_\_\_\_, California.

DocuSigned by:  
  
 0CEA78D28E2D461...

By:

CORY CULVER

# **EXHIBIT A**

**From:** [Cory Culver](#)  
**To:** [Meghan Palu](#)  
**Subject:** Fw: PG&E Fire Case Documents  
**Date:** Friday, February 28, 2020 4:31:46 PM  
**Attachments:** [Fee agreement fire cases with FG.pdf](#)  
[Intake Questionnaire.docx](#)

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**From:** Cory Culver  
**Sent:** Wednesday, September 25, 2019 9:41 AM  
**To:** keribea@aol.com <keribea@aol.com>  
**Subject:** PG&E Fire Case Documents

Hi Keri,

I apologize for not reaching out sooner. Please find attached our fee agreement and an intake questionnaire. I hope I am correct in assuming you were in the North Bay fires, I know you had mentioned your referral was one of our North Bay clients. If I am incorrect, please let me know and I will send you a set of forms that is for the right fire. Sorry for the lack of clarity on my part!

Please let me know if you have any questions. Thank you!

Cory Culver  
530-636-9000